

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	CRIMINAL NO. 19-10080
DAVID SIDOO, et al	)	
Defendants	)	
_____	)	

**DEFENDANTS' ASSENTED-TO MOTION FOR LEAVE TO FILE UNDER SEAL  
EXHIBITS TO THEIR REPLY TO THE GOVERNMENT'S OPPOSITION TO THEIR  
MOTION FOR PRODUCTION OF EXCULPATORY EVIDENCE REGARDING TITLE  
III INTERCEPTIONS AND CONSENSUAL RECORDINGS**

Now come the Defendants, by and through undersigned counsel, and hereby respectfully request that this Honorable Court permit them to file the exhibits to their Reply to the Government's Opposition to their Motion for Production of Exculpatory Evidence Regarding Title III Interceptions and Consensual Recordings under seal. As grounds and reasons therefor, the defendants state that filing the exhibits under seal will protect the privacy of third-parties, including well-known business people, athletes, and coaches, with whom Mr. Singer claimed to have been associated.

**WHEREFORE**, the defendants respectfully request that this Honorable Court allow them to file the exhibits to their Reply to the Government's Opposition to their Motion for Production of Exculpatory Evidence under seal.

**COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

Undersigned counsel has conferred with counsel for the government, and the

government, by and through AUSA Rosen, assents to the defendants' request to file the exhibits to their Reply to the Government's Opposition to their Motion for Production of Exculpatory Evidence under seal. The government, however, opposes the relief requested in the underlying Motion for Production of Exculpatory Evidence.

Respectfully Submitted,  
DAVID SIDOO and  
ROBERT ZANGRILLO  
By Their Attorney,

**/s/ Martin G. Weinberg**  
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Dated: January 23, 2020

**CERTIFICATE OF SERVICE**

I, Martin G. Weinberg, hereby certify that on this date, January 23, 2020, a copy of the foregoing document has been served via Electronic Court Filing system on all registered participants.

**/s/ Martin G. Weinberg**  
Martin G. Weinberg, Esq.